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Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

January 31, 2003

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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WRITERS DIRECT D I N

(202) 828-9473

Re: E911 Quarterly Report  
Rural Cellular Corporation for itself and its affiliates

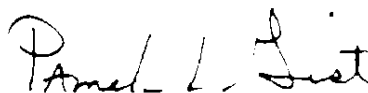
Dear Ms. Dortch:

On behalf of Rural Cellular Corporation and its subsidiaries' (collectively, "RCC") this letter is submitted to report the status of the company's implementation of E911 services.

RCC is a digital wireless carrier operating cellular radiotelephone and/or personal communications services in multiple markets. RCC is a Tier II carrier as defined in *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 2002 FCC LEXIS 3638, FCC 02-210 (2002) ("Phase II Stay Order"). This report is submitted in compliance with the terms of the Phase II Stay Order.

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,



Pamela L. Gist

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This report pertains to the following companies which are wholly-owned subsidiaries of Rural Cellular Corporation and are authorized by the FCC to provide broadband Commercial Mobile Radio Service: RCC Atlantic, Inc., RCC Holdings, Inc., RCC Minnesota, Inc., Wireless Alliance, LLC and TLA Spectrum, LLC.

# **Rural Cellular Corporation E911 Implementation Report**

## **Summary**

Rural Cellular Corporation ("RCC") has been aggressively pursuing fulfillment of numerous Phase 1 and Phase 2 E911 compliance requests. In general, the Phase 1 requests are being completed with minor difficulties, typically in the form of database, network or PSAP issues. The Phase 2 requests are presenting a considerable challenge given our rural service areas, which constitute most of RCC's markets.

Our Initial desire prior to 2002 was to deploy a handset based solution that would provide for the accuracy set forth in FCC Docket 94-102. However, due to the rural nature of RCC markets, we predominately have deployed TDMA networks. After discussions with our handset vendors it soon became apparent that a TDMA handset solution, similar to the AGPS/AFLT type handsets was not being developed. Research and development in the TDMA technology has all but stopped in favor of the GSM and CDMA network that will support the data application of the future. The mandate which requires RCC to meet the first tier of Phase 2 compliance within six months of a valid PSAP request has placed a substantial burden on RCC due to our TDMA network deployments. The only solution that can approach the accuracy requirements set forth involve the installation of a costly network based geo-location system. In late 2001 RCC began an extensive vendor selection process for network based solution to meet the requirements. In 2002, RCC selected Grayson Wireless as our vendor to meet the necessary mandate.

## **Network Based Solution:**

The Grayson Wireless solution utilizes a complex triangulation method to approximate the location of a 911-wireless caller. Additional equipment, power and data circuits are required at each cell to gather data from the call. In general, most sites will utilize the Time Difference of Arrival (TDOA) data to determine the handset's location. However Grayson has recommended large and cumbersome Angle of Arrival (AOA) antennas at many of our sites in order to achieve the mandated accuracy requirements. These AOA antennas provide the angle of the signal that is transmitted by the handset, this allows for more precise location of the 911 caller. After substantial review of RCC's cell sites and tower locations numerous challenges have surfaced in our attempts to deploy these AOA antennas. In many instances the tower will not support the additional weight of the AOA antennas and the necessary cables to connect to the antennas. In other cases the installation of AOA antennas would likely be delay or blocked by state environmental review or local zoning boards. These additional obstacles result in substantial financial and regulatory burden on RCC in our attempts to comply with the mandate. In spite of these obstacles RCC is in good faith proceeding with our network-based deployments in the states where we currently have valid Phase 2 requests.

## **Status of Phase 1 Requests:**

**Vermont:** RCC has completed the Phase 1 requirements in the state of the Vermont. We have successfully tested our ability to deliver both the subscriber's mobile number and the corresponding cell site location to the PSAP. We are in the process of fine-tuning the network and should be completed in the near future.

**Maine:** RCC is working with the State of Maine on the first Phase 1 E911 trials in the State. RCC is working with the County of Lincoln and the State's Emergency Services Communications Bureau. The parties hope to begin testing in the early March timeframe.

**Minnesota:** RCC has been actively working with all of the requesting counties to provide the Phase 1 in Minnesota. At this point many of the counties have been completed and tested. The remaining counties have not been completed due to delays in the addressing process for the actual cell site locations. RCC has provided the appropriate information to the jurisdiction parties and they are currently processing the addressing of our tower locations. In four other counties RCC is awaiting the completion of Phase 1 by the predominate carriers (T-mobile and AT&T Wireless) to complete our compliance. It is RCC's understanding that these processes are moving forward and we hope to complete all Phase 1 requests in the state of Minnesota in the near future.

**Alabama:** At this point most of the counties in Alabama that requested Phase 1 services have been tested and are in service. In the remaining counties, RCC is waiting for resolution of either the database addressing problems, challenges with the local telephone company and/or PSAP. RCC expects these remaining issues to be resolved and to meet all Phase 1 compliance requests within the coming months.

**Oregon:** RCC is nearing the completion of the Phase 1 testing in all of our Oregon Service areas that have requested Phase 1 service.

**Washington:** RCC has received several requests for Phase 1 service from counties in the state of Washington. We are in the process of installing the necessary circuits to the selective routers and coordinating the implementation of Phase 1. We expect to meet the six-month Phase 1 installation window in each of these counties.

**Massachusetts:** RCC has received a Phase 1 Request for the State of Massachusetts and we expect to comply within the six-month window.

**Mississippi:** RCC has received several requests for Phase 1 service from counties in the state of Mississippi. We are in the process of deploying these services and expect to complete the deployment within the specified timeframe.

**Kansas:** RCC has not received a Phase 1 request from the State of Kansas.

**New York:** **RCC** has not received a Phase I request from the State of New York.

**Wisconsin:** **RCC** has not received a Phase I request from the State of Wisconsin.

**South Dakota:** **RCC** has not received a Phase I request from the State of South Dakota.

**North Dakota:** **RCC** has not received a Phase I request from the State of North Dakota.

## **Status of Phase 2 Requests**

**Minnesota:** **RCC** has received a request from the state of Minnesota's 911 administrator to provide Phase 2 services. **RCC** has two networks operating in the state of Minnesota, one TDMA network and the second a GSM network. **RCC** is in the process of deploying a Grayson network based solution to meet our requirements. The network will consist of additional equipment installations at over 100 cell sites. In addition, power and data circuits will also be installed to support the systems. At the MSC or switch a **GSC** server will be installed to gather the data from the various Cell sites and locate the 911 caller. **As** discussed previously **RCC** will not deploy the AOA antennas in the initial part of our Phase 2 deployment. Due to the difficulty in deploying the AOA antennas, **RCC** will postpone their deployment until a future date. Preliminary computer models of the accuracy without the AOA antennas indicate that we may fall short of the accuracy required. **RCC** is proceeding with our deployment with the TDOA only network with the hope that we can achieve the necessary accuracy for 50% of our market. Given the limitations of the network based systems and the need for AOA antennas **RCC** is concerned that we will not be able to achieve the 100% accuracy requirement within the allotted timeframe. **As** discussed in the **FCC's** Hatfield report, rural wireless carrier networks have evolved along the main highways throughout our service area. The result is a network in which a mobile user is often "seen by" or communicating with only one cell site. By definition, in these areas triangulation is virtually impossible. **RCC** has investigated the installation of "geo-location only" sites to provide the necessary triangulation points. Unfortunately these geo-location only sites will require considerable effort to deploy, in the form of site location, construction, lease negotiation and other site-related issues.

**Vermont:** **RCC** is rapidly deploying the necessary equipment to meet our compliance timeline in the state of Vermont. Similar challenges exist in Vermont, as it relates to the deployment of AOA antennas. In particular Vermont is an extremely environmentally conscientious state and modifications or additions to existing cell sites are often delayed for years entangled in extensive permitting battles. At this point our vendor has confirmed that in the absence of AOA antennas it is unlikely that we will meet the accuracy threshold. We hope that the accuracy achieved will be adequate given our rural areas and the likelihood that the call will be placed along one of the main roads. Essentially, in rural areas the emergency personnel should be able to locate the 911 caller.

due to the probability that the caller will be located near one of the few roads. RCC has presented this limitation to the Vermont Enhanced Emergency 911 Board and we will be working to improve the accuracy to the best of our abilities.

**Alabama:** RCC has received only two requests for Phase 2 compliance for Alabama counties within our Service area. Unfortunately, RCC has only one cell site in each of these respective counties. We have designed a Phase 2 network that utilizes our cell sites and some geo-location only sites to provide the triangulation that is necessary. Once again we have discovered the limitations of a system in which AOA antennas are not deployed. We are however working diligently to meet our Phase 2 deployment timeline.

**RURAL CELLULAR CORPORATION**  
**E-911 Phase I Requests Activated**

State	Remediation Entity Name	PSAP	Date requested	Valid PSAP Database	Date E-911 Phase I Activated	Projected Deployment
AL	Baker	Baker	10/10/00	Yes	10/31/02	
AL	Calhoun	Calhoun	No Phase I request	Yes	10/31/02	Waiting on Database Vendor 02/28/03
AL	Chambers	Chambers	7/18/00	Yes	10/30/02	
AL	Chilton	Chilton	12/13/00	Yes	1/17/03	
AL	Chestaw	Chestaw	6/28/99	Yes	1/17/03	
AL	Clay	Clay	7/20/00	Yes	1/17/03	
AL	Cleburne	Cleburne	2/25/00	Yes	10/31/02	
AL	Clifford County	Clifford	2/2/01	Yes		Waiting on Database Vendor 02/28/03
AL	Enterprise	Enterprise	2/2/01	Yes		Waiting on Database Vendor 02/28/03
AL	Cosa	Cosa	No Phase I request			
AL	Covington	Covington	10/30/00	Yes		Waiting on Database Vendor 02/28/03
AL	Crenshaw	Crenshaw	2/2/01	Yes		Waiting on Database Vendor 02/28/03
AL	Dallas	Dallas	11/3/99	Yes	12/5/02	
AL	Fayette	Fayette	11/17/99	Yes		Waiting on Database Vendor 02/28/03
AL	Geneva County	Geneva County	10/17/00	Yes		Waiting on Database Vendor 02/28/03
AL	Greene	N/A	No Phase I request		1/17/03	
AL	Hale	Hale	5/11/99	Yes	1/17/03	
AL	Lamar	Lamar	11/15/00	Yes		Waiting on Database Vendor 02/28/03
AL	Lowndes	Lowndes	1/25/01	Yes		
AL	Marengo	Marengo	8/14/00	Yes	1/24/03	
AL	Perry	N/A	No Phase I request	Yes	1/17/03	
AL	Pickens	Pickens	7/17/00	Yes	N/A	
AL	Pike	Pike	No Phase I request		1/17/03	
AL	Randolph	Randolph	3/1/01	Yes	1/17/03	
AL	Sumter	Sumter	8/14/00	Yes	1/17/03	
AL	Talladega	Talladega	7/9/99	Yes		
AL	Tallapoosa	Tallapoosa	9/1/99	Yes	10/31/02	Waiting on Database Vendor 02/28/03
AL	Wilcox	Wilcox	7/19/00	Yes	1/17/03	
KS	Cheyenne		No Phase I requests			
KS	Rawlins		No Phase I requests			
KS	Decatur		No Phase I requests			
KS	Sherman		No Phase I requests			
KS	Thomas		No Phase I requests			
KS	Sheridan		No Phase I requests			
KS	Norton		No Phase I requests			
KS	Phillips		No Phase I requests			
KS	Smith		No Phase I requests			

State	Requesting Entity Name	Date requested	Valid PSAP		Date E911 Phase I Active	Reason if not	Projected Deployment Date
			Request	Phase I			

KS	Graham	No Phase I requests					
KS	Rooks	No Phase I requests					
KS	Oshorne	No Phase I requests					
KS	Wallace	No Phase I requests					
KS	Greedy	No Phase I requests					
KS	Fagan	No Phase I requests					
KS	Gove	No Phase I requests					
KS	Wichita	No Phase I requests					
KS	Scout	No Phase I requests					
KS	Lane	No Phase I requests					
KS	Frego	No Phase I requests					
KS	Ellis	No Phase I requests					
KS	Russell	No Phase I requests					
KS	Ness	No Phase I requests					
KS	Rush	No Phase I requests					
KS	Barban	No Phase I requests					
KS	Pawnee	No Phase I requests					
KS	Hannahan	No Phase I requests					
KS	Kearny	No Phase I requests					
KS	Finney	No Phase I requests					
KS	Stanford	No Phase I requests					
KS	Giant	No Phase I requests					
KS	Haskell	No Phase I requests					
KS	Morton	No Phase I requests					
KS	Stevens	No Phase I requests					
KS	Seward	No Phase I requests					
KS	Hodgeman	No Phase I requests					
KS	Gray	No Phase I requests					
KS	Ford	No Phase I requests					
KS	Mearle	No Phase I requests					
KS	Clark	No Phase I requests					
KS	Edwards	No Phase I requests					
KS	Stafford	No Phase I requests					
KS	Kiowa	No Phase I requests					
KS	Pratt	No Phase I requests					
KS	Comanche	No Phase I requests					
KS	Barber	No Phase I requests					

State of MA 10/28/02

Y

04/28/03

MA	Franklin	No Phase I requests					
ME	Arundook	No Phase I requests					
MD	Piscataquis	No Phase I requests					

State	Requesting Entity Name	PSAP	Date requested	Date E911		Reason if not	Projected Deployment Date
				SAP	Phase I		
				if	Active		
MI	Songfest		No Phase I requests				
MI	Pendleton		No Phase I requests				
MI	Walton		No Phase I requests				
MI	Knox		No Phase I requests				
MI	Umoia		No Phase I requests				
MI	Kennelbert		No Phase I requests				
MI	Sagadahoc		No Phase I requests				
MI	Cumberland		No Phase I requests				
MI	York		No Phase I requests				
MI	Oxford		No Phase I requests				
MI	Franklin		No Phase I requests				
MN	Atkin	Atkin	2/1/01			No E-911 addressing back from state	N/A
MN	Becker	Becker	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Beltrami	Beltrami	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Big Stone	Big Stone	2/1/01	Yes	3/29/02	No E-911 addressing back from state	N/A
MN	Carlton	Carlton	2/1/01	Yes	6/4/02		
MN	Cass	Cass	2/1/01	Yes	3/29/02		
MN	Clearwater	Clearwater	2/1/01	Yes			
MN	Crow Wing	Crow Wing	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Douglas	Douglas	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Grant	Grant	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Hubbard	Hubbard	2/1/01	Yes	4/19/02		
MN	Isanti	Isanti	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Itasca	Itasca	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Kanabec	Kanabec	2/1/01	Yes	3/27/02		
MN	Kittson	Kittson	2/1/01	Yes	4/5/02		
MN	Koochiching	Koochiching	2/1/01	Yes	4/3/02		
MN	Lake of the Woods	Lake of the Woods	2/1/01	Yes	4/11/02		
MN	Mahnomen	Mahnomen	2/1/01	Yes	4/12/02		
MN	Marshall	Marshall	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Miller Lakes	Miller Lakes	2/1/01	Yes	4/3/02		
MN	Morrison	Morrison	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Norman	Norman	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Otter Tail	Otter Tail	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Pennington	Pennington	2/1/01	Yes	4/12/02		
MN	Pine	Pine	2/1/01	Yes	5/10/02		
MN	Pope	Pope	2/1/01	Yes	4/23/02		
MN	Red Lake	Red Lake	2/1/01	Yes		No E-911 addressing back from state	N/A
MN	Roseau	Roseau	2/1/01	Yes	5/10/02		
MN	Stevens	Stevens	2/1/01	Yes	5/4/02		
MN	Swift	Swift	2/1/01	Yes	3/27/02	No E-911 addressing back from state	N/A



[illegible]

Date E911

State	Requesting Entity Name	PSAP	Date requested	Valid PSAP Request	Date E911 Phase I		Reason if not
					Active	Phase I	
NH	Stratford		No Phase I requests for NH				
NH	Sullivan		No Phase I requests for NH				
NY	Clinton		No Phase I requests for NY				
NY	Essex		No Phase I requests for NY				
NY	Franklin		No Phase I requests for NY				
NY	Lulton		No Phase I requests for NY				
NY	Hamilton		No Phase I requests for NY				
OR	Baker Co SO	Baker Co SO	Prior to April 2000	Yes			Finalizing translations and testing
OR	Benton	Benton	No request				
OR	Covallis Regional Comm Ctr - Benton Co	Covallis Regional Comm Ctr - Benton Co	Prior to April 2000	Yes	5/23/02		
OR	Crook	Crook	No request				
OR	Deschutes	Deschutes	Prior to April 2000	Yes	1/23/03		
OR	Grant	Grant	No request				
OR	Harney	Harney	No request				
OR	Hermiston PD	Hermiston PD	Prior to April 2000	Yes			
OR	Klamath	Klamath	Prior to April 2000	Yes	8/29/02		Finalizing translations and testing
OR	Lake	Lake	No request				
OR	Lincoln	Lincoln	Prior to April 2000	Yes	8/14/02		
OR	Linn County Sheriff's Office	Linn County Sheriff's Office	Prior to April 2000	Yes	5/23/02		
OR	Malheur	Malheur	No request				
OR	Toledo PD	Toledo PD	Prior to April 2000	Yes	8/14/02		
OR	Umatilla Co SO	Umatilla Co SO	Prior to April 2000	Yes			Finalizing translations and testing
OR	Union	Union	No request				
OR	Wallowa	Wallowa	No request				
SD	Clark		No Phase I requests for SD				
SD	Codington		No Phase I requests for SD				
SD	Day		No Phase I requests for SD				
SD	Deuel		No Phase I requests for SD				
SD	Grant		No Phase I requests for SD				
SD	Hamlin		No Phase I requests for SD				
SD	Lincoln		No Phase I requests for SD				
SD	Marshall		No Phase I requests for SD				
SD	Minnehaha		No Phase I requests for SD				
SD	Roberts		No Phase I requests for SD				
VT	Vermont State Enhanced 911 Board	Vermont State E911 System		Yes	10/11/02		
WA	Asotin		12/2/02	Yes			06/02/03
WA	Chehalis		12/12/02	Yes			06/02/03

State	Requesting Entity Name	Date requested	Valid PSAP Request	Date E911 Phase I		Reason if not	Projected Deployment Date
				Active	Not Active		
WA	Columbia	11/4/02	Yes				05/04/03
WA	Douglas	10/24/02	Yes				04/24/03
WA	Lerry	12/2/02	Yes				06/02/03
WA	Coufield	10/28/02	Yes				04/25/03
WA	Okavogato	10/31/02	Yes				4/31/03
WA	Pend Oreille	11/8/02	Yes				05/08/03
WA	Stevens	12/10/02	Yes				06/10/03
WA	Walla Walla	9/11/02	Yes				03/11/03
WA	Whitman	4/24/02	Yes	01/31/03			
WI	Douglas County	No Phase I requests for WI					

**EIRAI CELLULAR CORPORATION**  
**E-911 Phase II Requests Activated**

Co	Name	City Name	PSAP	Date requested	Date E-911		Projected Deployment
					Valid PSAP Request	Phase II Action	
MI	Hartler	Hartler	Hartler	Not Requested			
MI	Calthoun	Calthoun	Calthoun	Not Requested			
MI	C hamblers	C hamblers	C hamblers	Not Requested			
MI	C hilton	C hilton	C hilton	Not Requested			
MI	C hockaw	C hockaw	C hockaw	Not Requested			
MI	C lay	C lay	C lay	Not Requested			
MI	C Leburne	C Leburne	C Leburne	Not Requested			
MI	C office - C county	C office	C office	Not Requested			
MI	C office - C enterprise	C enterprise	C enterprise	Not Requested			
MI	C oosa	C oosa	C oosa	Not Requested			
MI	C ovington	C ovington	C ovington	Not Requested			
MI	C renshaw	C renshaw	C renshaw	Not Requested			
MI	Dallas	Dallas	Dallas	Not Requested			
MI	Fayette	Fayette	Fayette	12.2.02	Yes		6-2-03
MI	Genewa County	Genewa County	Genewa County	Not Requested			
MI	Greene	Greene	Greene	Not Requested			
MI	Hale	Hale	Hale	Not Requested			
MI	Lamar	Lamar	Lamar	9-27-02	Yes		11-27-03
MI	Lowndes	Lowndes	Lowndes	Not Requested			
MI	Marengo	Marengo	Marengo	Not Requested			
MI	Perry	Perry	Perry	Not Requested			
MI	Pickens	Pickens	Pickens	Not Requested			
MI	Pike	Pike	Pike	Not Requested			
MI	Randolph	Randolph	Randolph	Not Requested			
MI	Sunter	Sunter	Sunter	Not Requested			
MI	Talladega	Talladega	Talladega	Not Requested			
MI	Tallapoosa	Tallapoosa	Tallapoosa	Not Requested			
MI	Wilcox	Wilcox	Wilcox	Not Requested			
KS	C heyenne	C heyenne	C heyenne	No Phase 2 requests for KS			
KS	Kavins	Kavins	Kavins	No Phase 2 requests for KS			
KS	Decatur	Decatur	Decatur	No Phase 2 requests for KS			
KS	Sherran	Sherran	Sherran	No Phase 2 requests for KS			
KS	Thomas	Thomas	Thomas	No Phase 2 requests for KS			
KS	Sheridan	Sheridan	Sheridan	No Phase 2 requests for KS			
KS	Norton	Norton	Norton	No Phase 2 requests for KS			
KS	Phillips	Phillips	Phillips	No Phase 2 requests for KS			
KS	Smith	Smith	Smith	No Phase 2 requests for KS			
KS	Graham	Graham	Graham	No Phase 2 requests for KS			
KS	Rooks	Rooks	Rooks	No Phase 2 requests for KS			

State	Requesting Entity Name	Date requested	Valid PSAP Request	Date E-911 Phase II		Projected Deployment Date
				Active	Reason if not	
KS	Cushman	No Phase 2 requests for KS				
KS	Wallace	No Phase 2 requests for KS				
KS	Greely	No Phase 2 requests for KS				
KS	Togian	No Phase 2 requests for KS				
KS	Grove	No Phase 2 requests for KS				
KS	Wichita	No Phase 2 requests for KS				
KS	Scout	No Phase 2 requests for KS				
KS	Fane	No Phase 2 requests for KS				
KS	Trego	No Phase 2 requests for KS				
KS	Ellis	No Phase 2 requests for KS				
KS	Russell	No Phase 2 requests for KS				
KS	Ness	No Phase 2 requests for KS				
KS	Rush	No Phase 2 requests for KS				
KS	Barton	No Phase 2 requests for KS				
KS	Lawrence	No Phase 2 requests for KS				
KS	Hamilton	No Phase 2 requests for KS				
KS	Kearny	No Phase 2 requests for KS				
KS	Finney	No Phase 2 requests for KS				
KS	Stanton	No Phase 2 requests for KS				
KS	Grant	No Phase 2 requests for KS				
KS	Haskell	No Phase 2 requests for KS				
KS	Morton	No Phase 2 requests for KS				
KS	Stevens	No Phase 2 requests for KS				
KS	Seward	No Phase 2 requests for KS				
KS	Hodgeman	No Phase 2 requests for KS				
KS	Gray	No Phase 2 requests for KS				
KS	Ford	No Phase 2 requests for KS				
KS	Meade	No Phase 2 requests for KS				
KS	Clark	No Phase 2 requests for KS				
KS	Edwards	No Phase 2 requests for KS				
KS	Stafford	No Phase 2 requests for KS				
KS	Knowl	No Phase 2 requests for KS				
KS	Pratt	No Phase 2 requests for KS				
KS	Comanche	No Phase 2 requests for KS				
KS	Barber	No Phase 2 requests for KS				
MA	Franklin	No Phase 2 requests for MA				
ME	Acworth	No Phase 2 requests for ME				
ME	Piscataquis	No Phase 2 requests for ME				
ME	Somerset	No Phase 2 requests for ME				
ME	Penobscot	No Phase 2 requests for ME				
ME	Waldo	No Phase 2 requests for ME				
ME	Knox	No Phase 2 requests for ME				

State	Requesting Entity Name	PSAP	Date requested	Request	Valid PSAP Phase II	Projected Deployment Date
MT	Lewistown		No Phase 2 requests for ME	Request	Active	
MT	Remedios		No Phase 2 requests for ME	Request	Active	
MT	Sagehollow		No Phase 2 requests for ME	Request	Active	
MT	Yukon-Charley		No Phase 2 requests for ME	Request	Active	
MT	Yukon		No Phase 2 requests for ME	Request	Active	
MT	Chisna		No Phase 2 requests for ME	Request	Active	
MT	Franklin		No Phase 2 requests for ME	Request	Active	
MTN	Ankeny	Ankeny	2/1/01	✓	✓	
MTN	Becker	Becker	2/1/01	✓	✓	
MTN	Bellevue	Bellevue	2/1/01	✓	✓	
MTN	Big Stone	Big Stone	2/1/01	✓	✓	
MTN	Carlton	Carlton	2/1/01	✓	✓	
MTN	Cass	Cass	2/1/01	✓	✓	
MTN	Clearwater	Clearwater	2/1/01	✓	✓	
MTN	Crow Wing	Crow Wing	2/1/01	✓	✓	
MTN	Douglas	Douglas	2/1/01	✓	✓	
MTN	Grant	Grant	2/1/01	✓	✓	
MTN	Hubbard	Hubbard	2/1/01	✓	✓	
MTN	Isanti	Isanti	2/1/01	✓	✓	
MTN	Jasper	Jasper	2/1/01	✓	✓	
MTN	Kanabec	Kanabec	2/1/01	✓	✓	
MTN	Karnes	Karnes	2/1/01	✓	✓	
MTN	Keweenaw	Keweenaw	2/1/01	✓	✓	
MTN	Lake of the Woods	Lake of the Woods	2/1/01	✓	✓	
MTN	Marathon	Marathon	2/1/01	✓	✓	
MTN	Marshall	Marshall	2/1/01	✓	✓	
MTN	Millie Lake	Millie Lake	2/1/01	✓	✓	
MTN	Morrison	Morrison	2/1/01	✓	✓	
MTN	Norman	Norman	2/1/01	✓	✓	
MTN	Outer Tail	Outer Tail	2/1/01	✓	✓	
MTN	Pennington	Pennington	2/1/01	✓	✓	
MTN	Pine	Pine	2/1/01	✓	✓	
MTN	Pope	Pope	2/1/01	✓	✓	
MTN	Red Lake	Red Lake	2/1/01	✓	✓	
MTN	Roseau	Roseau	2/1/01	✓	✓	
MTN	Sevens	Sevens	2/1/01	✓	✓	
MTN	Swift	Swift	2/1/01	✓	✓	
MTN	Todd	Todd	2/1/01	✓	✓	
MTN	Traverse	Traverse	2/1/01	✓	✓	
MTN	Wadena	Wadena	2/1/01	✓	✓	
MTN	Wilkens	Wilkens	2/1/01	✓	✓	
MTN	St. Louis	St. Louis	2/2/01	✓	✓	
MTN	Clay	Clay	2/3/01	✓	✓	

ID	County/County Name	DC SID	Date requested	Date E911		Projected Deployment	
				Valid PSAP Request	Phase II Active	Deployment Date	Phase II Active
MS	Stearns	Stearns	2/5/01	Yes		Due March 2003 50% Due March 2003 50% Due March 2003 50%	Jul-03 Aug-03 Sep-03
MS	Benon	Benon	2/6/01	Yes			
MS	Sherburne	Sherburne	2/7/01	Yes			
MS	Lapua		No Phase 2 requests in MS				
MS	Lake		No Phase 2 requests in MS				
MS	Marshall		No Phase 2 requests in MS				
MS	Ordway		No Phase 2 requests in MS				
MS	Quinton		No Phase 2 requests in MS				
MS	Parola		No Phase 2 requests in MS				
MS	Lakeview		No Phase 2 requests in MS				
MS	Redwin		No Phase 2 requests in MS				
MS	Southwest		No Phase 2 requests in MS				
MS	Lakeland		No Phase 2 requests in MS				
MS	Leflore		No Phase 2 requests in MS				
MS	Carroll		No Phase 2 requests in MS				
MS	Holmes		No Phase 2 requests in MS				
MS	Yalobusha		No Phase 2 requests in MS				
MS	Greenwald		No Phase 2 requests in MS				
MS	Ordway		No Phase 2 requests in MS				
MS	Chickasaw		No Phase 2 requests in MS				
MS	Monroe		No Phase 2 requests in MS				
MS	Clay		No Phase 2 requests in MS				
ND	Cass		No Phase 2 requests in ND				
ND	Todd		No Phase 2 requests in ND				
ND	Grand Forks		No Phase 2 requests in ND				
NIH	Clatsop		No Phase 2 requests in NIH				
NIH	Clatsop		No Phase 2 requests in NIH				
NIH	Clatsop		No Phase 2 requests in NIH				
NIH	Hillsborough		No Phase 2 requests in NIH				
NIH	Stratford		No Phase 2 requests in NIH				
NIH	Sullivan		No Phase 2 requests in NIH				
NY	Clinton		No Phase 2 requests in NY				
NY	Essex		No Phase 2 requests in NY				
NY	Franklin		No Phase 2 requests in NY				
NY	Fulton		No Phase 2 requests in NY				
NY	Hamilton		No Phase 2 requests in NY				
OR	Isaker Co SO		No Phase 2 requests in OR				
OR	Benon		No Phase 2 requests in OR				

State	Requesting Entity Name	PSAP	Date requested	Valid PSAP Request	Date E911 Phase II Active	Reason if not	Projected Deployment Date
OR	Coxville Regional Council - Benton Co		No Phase 2 requests in OR				
OR	Clark		No Phase 2 requests in OR				
OR	Deschutes		No Phase 2 requests in OR				
OR	Grant		No Phase 2 requests in OR				
OR	Harney		No Phase 2 requests in OR				
OR	Hemlock PD		No Phase 2 requests in OR				
OR	Klamath		No Phase 2 requests in OR				
OR	Lake		No Phase 2 requests in OR				
OR	Lincoln		No Phase 2 requests in OR				
OR	Linn County Sheriff's Office		No Phase 2 requests in OR				
OR	Malheur		No Phase 2 requests in OR				
OR	Orickville PD		No Phase 2 requests in OR				
OR	Tamathia Co SO		No Phase 2 requests in OR				
OR	Timon		No Phase 2 requests in OR				
OR	Wahowa		No Phase 2 requests in OR				
SD	Clark		No Phase 2 requests in SD				
SD	Clatsop		No Phase 2 requests in SD				
SD	Day		No Phase 2 requests in SD				
SD	Deuel		No Phase 2 requests in SD				
SD	Grant		No Phase 2 requests in SD				
SD	Hardin		No Phase 2 requests in SD				
SD	Lincoln		No Phase 2 requests in SD				
SD	Marshall		No Phase 2 requests in SD				
SD	Minnehaha		No Phase 2 requests in SD				
SD	Roberts		No Phase 2 requests in SD				
VT	Vermont State Enhanced 911 Board	Vermont State E911 System		Yes		Due March 2003 50%	Mar-03
WA	Asotin		No Phase 2 requests in WA				
WA	Chehalis		No Phase 2 requests in WA				
WA	Columbia		No Phase 2 requests in WA				
WA	Douglas		No Phase 2 requests in WA				
WA	Ferry		No Phase 2 requests in WA				
WA	Garfield		No Phase 2 requests in WA				
WA	Okanogan		No Phase 2 requests in WA				
WA	Pend Oreille		No Phase 2 requests in WA				
WA	Snohomish		No Phase 2 requests in WA				
WA	Walla Walla		No Phase 2 requests in WA				
WA	Whitman		No Phase 2 requests in WA				
WI	Douglas County		No Phase 2 requests in WI				



**A F F I D A V I T**

County of Douglas

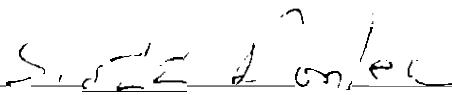
SS

State of Minnesota

I, SCOTT DONLEA, having been first duly sworn, depose and state as follows:

1. I am Vice President – Market Development for Rural Cellular Corporation.
2. I am familiar with the facts contained in the foregoing Quarterly Report of Phase-In of E911 Phase II Compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct

  
\_\_\_\_\_  
Scott Donlea  
Vice President -- Market Development  
Rural Cellular Corporation

Subscribed to and sworn to before me  
this 17 day of October, 2003

\_\_\_\_\_  
Notary Public

My commission expires: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I, Loren Costantino, an employee in the law offices of Lukas, Nace Gutierrez & Sachs, Chartered, do hereby certify that I have on this 31st day of January, 2003, sent by U.S. Mail, a copy of the foregoing E911 Quarterly Report of Rural Cellular Corporation (for itself and its affiliates) to the following:

Thomas J. Sugrue, Bureau Chief\*  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12th Street, S.W., Room 3-C252  
Washington, DC 20554

Barry J. Ohlson, Chief\*  
Policy Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12th Street, S.W., Room 3-C124  
Washington, DC 20554

Jennifer Tomchin\*  
Policy Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12th Street, S.W., Room 3-A161  
Washington, DC 20554

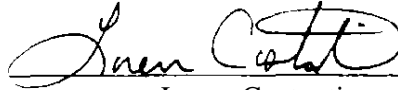
Robert M. Gurss  
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600 14th Street, N.W., Suite 800  
Washington, DC 20005  
***Counsel for APCO***

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***Counsel for NENA and NASNA***

John Ramsey. Executive Director  
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World Headquarters  
351 N. Williamson Blvd.  
Daytona Beach, FL 321 14-1112

Jim Goerke, Interim Executive Director  
**NENA**  
**422** Beecher Rd.  
Columbus, OH 43230

Evelyn Bailey. Executive Director, **NASNA**  
Vermont Enhanced 9-1-1 Board  
94 State Street  
Drawer 20  
Montpelier, VT 05620-6501

A handwritten signature in cursive script, appearing to read "Loren Costantino", written over a horizontal line.

Loren Costantino

\*By Hand-Deliver).